Derek W. Loeser (admitted *pro hac vice*) KELLER ROHRBACK L.L.P.

1201 Third Avenue, Suite 3200

Seattle, WA 98101 Tel.: (206) 623-1900 Fax: (206) 623-3384

dloeser@kellerrohrback.com

Plaintiffs' Co-Lead Counsel

Additional counsel listed on signature page

Lesley E. Weaver (SBN 191305) BLEICHMAR FONTI & AULD LLP 555 12th Street, Suite 1600

Tel.: (415) 445-4003 Fax: (415) 445-4020 lweaver@bfalaw.com

Oakland, CA 94607

## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION

IN RE: FACEBOOK, INC. CONSUMER PRIVACY USER PROFILE LITIGATION

MDL No. 2843 Case No. 18-md-02843-VC

This document relates to:

**ALL ACTIONS** 

NOTICE REGARDING REVISIONS TO PROPOSED ORDER GRANTING PRELIMINARY APPROVAL AND PROPOSED NOTICE OF CLASS ACTION SETTLEMENT

Judge: Hon. Vince Chhabria Courtroom: 4, 17th Floor The Court ordered Plaintiffs' counsel to "review the proposed notice and proposed order to ensure that both comply fully with the Court's standing order." Order, Feb. 10, 2023, ECF No. 1105. Counsel were either to "submit any revised documents" or "file a notice affirming that all submitted documents [were] in compliance." *Id*.

In accordance with the order, Plaintiffs are submitting revised versions of the proposed order (initially filed at ECF No. 1096, Ex. 1-A) and proposed notice (initially filed at ECF No. 1096, Ex. 1-D). Redlined versions of the proposed order and proposed notice are attached hereto as **Appendices A** and **B**, respectively. Clean versions of the proposed order and proposed notice are attached hereto as **Appendices C** and **D**, respectively.

The two tables below identify each revision and, for each revision, the provision of the Court's standing order that required it.

## Revisions to Proposed Order

Location of revision	Relevant provision of the Court's civil standing order
Paragraph 14	Page 15, second paragraph (substantial compliance)
Paragraph 17	Page 15, second paragraph (excused for good cause)

## Revisions to Proposed Notice

Location of revision	Relevant provision of the Court's civil standing order
Page 5, question 9	Page 14, bottom paragraph (notice of "identical factual predicate")
Page 8, question 17	Page 15, second paragraph (excused for good cause)

Dated: February 17, 2023

KELLER ROHRBACK L.L.P.

By: /s/ Derek W. Loeser

Derek W. Loeser

Derek W. Loeser (admitted *pro hac vice*)

Cari Campen Laufenberg (admitted pro hac vice)

David Ko (admitted *pro hac vice*)

Adele A. Daniel (admitted *pro hac vice*)

Benjamin Gould (SBN 250630)

Emma M. Wright (admitted pro hac vice)

1201 Third Avenue, Suite 3200

Seattle, WA 98101

Tel.: (206) 623-1900

Fax: (206) 623-3384 dloeser@kellerrohrback.com

claufenberg@kellerrohrback.com

dko@kellerrohrback.com

adaniel@kellerrohrback.com

bgould@kellerrohrback.com

ewright@kellerrohrback.com

Christopher Springer (SBN 291180)

801 Garden Street, Suite 301

Santa Barbara, CA 93101

Tel.: (805) 456-1496

Fax: (805) 456-1497

cspringer@kellerrohrback.com

Eric Fierro (admitted *pro hac vice*)

3101 North Central Avenue, Suite 1400

Phoenix, AZ 85012

Tel: (602) 248-0088

Fax: (602) 248-2822

efierro@kellerrohrback.com

Respectfully submitted,

BLEICHMAR FONTI & AULD LLP

By: /s/ Lesley E. Weaver

Lesley E. Weaver

Lesley E. Weaver (SBN 191305)

Anne K. Davis (SBN 267909)

Matthew S. Melamed (SBN 260272)

Angelica M. Ornelas (SBN 285929)

Joshua D. Samra (SBN 313050)

555 12th Street, Suite 1600

Oakland, CA 94607

Tel.: (415) 445-4003

Fax: (415) 445-4020

lweaver@bfalaw.com

adavis@bfalaw.com

mmelamed@bfalaw.com

aornelas@bfalaw.com

jsamra@bfalaw.com

Plaintiffs' Co-Lead Counsel

2

## ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(h)(3)

I, Lesley E. Weaver, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 17th day of February, 2023, at Oakland, California.

/s/ Lesley E. Weaver
Lesley E. Weaver